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June 16, 2025

VIA ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Herrera v. Van Laere LLC*
Case No.: 1:25-cv-2426

Dear Judge Liman,

The undersigned represents Edery Herrera, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Van Laere LLC, ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for June 20, 2025, at 10:00 AM (Dkt. 6) be adjourned for 60 days because the Defendant was recently served (Dkt. 7) and their counsel has not yet answered or appeared in this action. This request will grant ample time for the Defendant to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an extension.


Respectfully submitted,

GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.

GRANTED. The initial pretrial conference scheduled for June 20, 2025 is adjourned to August 25, 2025 at 11:00 AM.

SO ORDERED.


LEWIS J. LIMAN
United States District Judge

June 17, 2025